

1 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

LYNN L. KRIEGER, SB# 209592

2 MATTHEW W.J. JOHNSTON, SB# 300222

333 Bush Street, Suite 1100

3 San Francisco, California 94104-2872

Telephone: 415.362.2580

4 Facsimile: 415.434.0882

5 Attorneys for Defendant and Counter-Claimant

THOAI VAN NGUYEN

6  
7  
8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10  
11 SORIHIN, aka SORIHIN SORIHIN, an  
individual; and ABDUL FATAH, an  
12 individual,

13 Plaintiff,

14 vs.

15 THOAI VAN NGUYEN, an individual doing  
business as SEA QUEEN II,

16 Defendant.

17  
18 AND RELATED CROSS-ACTIONS

CASE NO. 3:16-cv-05422 JST

**STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE CASE  
MANAGEMENT CONFERENCE**

19  
20 The Parties in the above-entitled action jointly submit this Stipulation and Proposed Order  
21 and request the Court to adopt it as the Order in this case.

22 WHEREAS, this Court scheduled a Case Management Conference in the above referenced  
23 matter for November 8, 2017 at 2:00 p.m.

24 WHEREAS, the Parties have reached a tentative settlement and are negotiating settlement  
25 terms in an effort to resolve this suit, with the ongoing assistance of court-appointed neutral  
26 Howard Herman;

27 WHEREAS, the Parties intend to continue working with Mr. Herman to finalize the  
28 remaining settlement terms in the coming weeks;

1 WHEREAS, the Parties have agreed to continue the Case Management Conference to  
2 December 6, 2017 at 2:00 p.m. or to a later date and time convenient to the Court;

3 THEREBY, the Parties stipulate to and respectfully request a continuance of the upcoming  
4 Case Management Conference on November 8, 2017 to a date on or after December 6, 2017.

5 Respectfully submitted,

6 DATED: October 25, 2017

LEWIS BRISBOIS BISGAARD & SMITH LLP

7 By: /s/ Lynn L. Krieger

8 Lynn L. Krieger

9 Matthew W.J. Johnston

Attorneys for Defendant and Counter-Claimant

THOAI VAN NGUYEN

11 DATED: October 25, 2017

LEGAL AID AT WORK

12 By: /s/ Mana Barari

13 Mana Barari

14 Carole Vigne

15 Agnieszka Fryszman

COHEN MILSTEIN SELLERS & TOLL PLLC

16 Yenny Teng-Lee

17 THE LAW OFFICE OF YENNY TENG-LEE

18 Attorneys for Plaintiffs SORIHIN, aka SORIHIN  
19 SORIHIN and ABDUL FATAH

20  
21 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

22 I, Lynn L. Krieger, attest that concurrence in the filing of this document has been obtained  
23 from each of the other signatories. I declare under penalty of perjury under the laws of the United  
24 States of America that the foregoing is true and correct.

25  
26 October 25, 2017

By: /s/ Lynn L. Krieger

27 Lynn L. Krieger

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

~~[PROPOSED]~~ ORDER

Based upon the agreement of the Parties, and the Court finding good cause, IT IS  
HEREBY ORDERED THAT the Parties' Stipulation to Continue the Case Management  
Conference is GRANTED and entered as an Order of the Court. The Case Management  
Conference currently scheduled for November 8, 2017 at 2:00 p.m. is continued to  
December 20, 2017 at 2:00 p.m..

IT IS SO ORDERED.

DATED: October 26, 2017

  
\_\_\_\_\_  
HONORABLE JON S. TIGAR  
United States District Court Judge